

**IN THE UNITED STATES BANKRUPTCY COURT**

**Eastern District of Pennsylvania (Philadelphia)**

IN RE:

JIGNESH PANDYA AND MITAL PANDYA

Debtors.

Chapter 11

Case No.: 24-10440-AMC

**NOTICE OF APPEARANCE  
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE THAT Meridian Bank, by and through undersigned counsel, enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and Sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in these cases be given and served as follows:

Scott M. Klein, Esquire  
BROWN McGARRY NIMEROFF LLC  
158 W. Gay Street, Suite 200  
West Chester, PA 19380  
267-319-1740  
484-631-1302 (fax)  
Email: [sklein@bmnlawyers.com](mailto:sklein@bmnlawyers.com)

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, this demand includes not only notices and papers referred to in the Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, email, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Meridian

Bank's right (i) to have final orders in non-core matters and certain core matters entered by an Article III judge or entered only after de novo review by a higher court; (ii) to trial by jury in any proceeding so triable herein or in any related case, controversy or proceeding; (iii) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Meridian Bank is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

Dated: February 21, 2024

BROWN McGARRY NIMEROFF LLC

By: /s/ Scott M. Klein  
Scott M. Klein, Esquire  
BROWN McGARRY NIMEROFF LLC  
158 W. Gay Street, Suite 200  
West Chester, PA 19380  
267-319-1740  
484-631-1302 (fax)  
Email: [sklein@bmnlawyers.com](mailto:sklein@bmnlawyers.com)  
*Attorneys for Meridian Bank*

**IN THE UNITED STATES BANKRUPTCY COURT**

**Eastern District of Pennsylvania (Philadelphia)**

IN RE:

JIGNESH PANDYA AND MITAL PANDYA

Debtors.

Chapter 11

Case No.: 24-10440-AMC

**CERTIFICATE OF SERVICE**

I, Scott M. Klein, hereby certify that on this 21<sup>st</sup> day of February, 2024, I caused a true and correct copy of the foregoing to be electronically filed using the Court's CM/ECF System and served upon those parties requesting service therefrom. The document is available for viewing and downloading.

By: /s/ Scott M. Klein  
Scott M. Klein, Esquire